



U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE
OFFICE OF RESPONSE AND RESTORATION
ASSESSMENT AND RESTORATION DIVISION
BUILDING 4
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September 15, 2006

Mr. Chip Humphrey & Mr. Eric Blischke
Portland Harbor Remedial Project Managers
U. S. Environmental Protection Agency, Region X
Oregon Operations Office
811 Sixth Avenue, 3rd Floor
Portland, OR 97204

Dear Sirs:

The natural resource Trustees for the Portland Harbor NPL Site have reviewed the Portland Harbor RI/FS Field Sampling Plan: Round 3 Sampling for Lamprey (*Lampetra* sp.) Ammocoete Tissue - August 24, 2006 - prepared for the Lower Willamette Group by Windward Environmental LLC. This FSP generally describes what was discussed by the Sturgeon Lamprey Task Team, Oregon & EPA during our coordination and planning effort for assessing the Pacific lamprey ammocoete protection endpoint. The FSP appears to represent a sincere effort by the LWG to begin to address risk assessment questions for this important shared natural resource.

The Trustees recommend that the field effort commence next Wednesday, September 20, as logistics presently dictate. Trustee representatives are prepared to participate as of that date. I have compiled Trustee comments and present them here for your use. We have tried to concentrate on the most important issues and look forward to quick agreement on these details, considering potential restraints on this year's remaining field season (increasing river volume, currents, debris and decreasing temperature).

The Trustees recognize this is likely to be the last attempt at catching ammocoetes in the greater ISA, if this effort proves unsuccessful. An overall FSP objective must be to exert a given amount of fishing effort with a 'proven' technology to definitively determine if ammocoetes are residing within the ISA, e.g., maybe ammocoetes aren't resident in the ISA in substantial numbers (given the level of effort expended).... The shocker/sucker technology should be employed to some degree to resolve this question and facilitate and defend a working conclusion about residency in order to timely move the Portland Harbor ERA forward to completion.



The Trustees would appreciate if EPA could arrange for one Trustee observer slot to be available each day, as appropriate, during the effort. The Trustees do not expect that a Trustee observer will participate in the entire field effort. These Trustee 'hands' will be available to pitch in to assist Windward &/or their contractor in the field effort.

Additionally, Stan van de Wetering, of Siletz, has offered to deploy his UW photographic equipment during the effort. The photographic evidence that may be derived can be used to document compliance with the terms of the ESA consultation for this effort, i.e., concern for incidental take of or harm to endangered species individuals. The equipment might prove useful as a diagnostic tool to modify the technique, if the sampling effort proves less than successful. The Trustees recommend that EPA and the LWG assist us in taking advantage of this offer and help accommodate Dr. van de Wetering when his schedule permits sometime during the field effort.

General Coordination Recommendations:

- That the first 'couple of' field days be considered a field reconnaissance / 'shake down' / coordination focused event, while EPA vessel-carried observers are in the field (W 9/20 & part of Th 9/21? 6-10 trustees, risk assessors, resource managers - Joe Goulet POC). Glitches revealed and 'fixed' may reduce the need major field revisions in protocols.
- That a schedule of effort be established & changes be well coordinated with the Trustees to facilitate participation coordination during the field efforts. Rob Neely is gathering cell phone contact info, coordinating trustees' participation schedules and will attempt to coordinate 'trustee boat' availability.
- That as a contingency a critical decision rapid approval mechanism be established as a contingency if major consultation might be required during the effort – e.g., termination of effort or major sampling re-design based on field conditions (predesignated cell phone contacts?).

Specific Comments

- The Trustees appreciate the 9/11/06 addendum to the FSP as an effort to make the ammocoete sampling cover the ISA with additional upstream sample locations. The upper additional locations should be approximately RM 11-

11.7 and the depositional areas upstream & around Ross Island, Hardtack Island & East Island (~RM 15-16).

- The Trustees recommend that more of the 22 candidate sampling areas be considered to secure replicate samples and better understand intra-area variance, e.g., 2 - 3 replicates from areas where many normal or particularly large ammocoetes are being taken thus easily meeting tissue mass requirements.
- Field team cooperation and flexibility must be enabled and encouraged to assure the area is appropriately sampled.
 - There should be enough flexibility to move on to new / neighboring 'spots' if lamprey are not found precisely within sampling polygon boundaries (i.e., somewhat fuzzy sampling areas).
 - The 30 'casts' specified in the FSP should be considered as an appropriate minimum level of effort.
- If ammocoete fishing proves 'successful', sampling should continue in that area until tissue mass requirements are met, even if additional casts are needed (i.e., low but 'productive' catch per effort requiring reasonable additional effort).
- Coordinates of each 'productive' sample cast should be recorded. If the sampler is used in 'transect' fashion, starting & ending positions of productive transects should be recorded.
- Catch per effort should be recorded (e.g., per cast or per minute).

Conclusion

We appreciate the continuing cooperative relationship between the Trustees, NOAA and the EPA toward our mutual goal of protecting and restoring our Nations' natural resources. A conference call this week among the partners may be needed to sort out the final design issues. NOAA will be glad to provide a conference call dial in number. Please feel free to contact me at (206) 526-6938 if you would like to discuss any of these issues.

On Behalf of the Trustees,

Ron Gouguet
NOAA Coastal Resource Coordinator